

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: Subpoena Served on Apex Fund Services

CAMSHAFT CAPITAL FUND, LP;
CAMSHAFT CAPITAL ADVISORS, LLC;
and CAMSHAFT CAPITAL MANAGEMENT,
LLC,

Applicants/Defendants,

v.

BYJU'S ALPHA, INC.,

Respondent/Plaintiff.

Case No: 1:24-mc-171

(Arising from Case Nos. 24-10140
(JTD) and 24-50013 (JTD) in the
United States Bankruptcy Court For
the District of Delaware)

NOTICE OF MOTION TO QUASH NON-PARTY SUBPOENA

PLEASE TAKE NOTICE that Applicants Camshaft Capital Fund, LP; Camshaft Capital Advisors, LLC, and Camshaft Capital Management, LLC (collectively, “Camshaft”), through their undersigned counsel, will move this Court, at a date and time to be determined by the Court, for entry of an order quashing Respondent’s subpoena to non-party Apex Fund Services (“Apex”) dated April 4, 2024 in connection with Case Nos. 24-10140 (JTD) and 24-50013 (JTD) in the United States Bankruptcy Court For the District of Delaware (“the Subpoena”).

Camshaft brings its Motion pursuant to the Federal Rule of Civil Procedure 45. In support of this Motion, Camshaft submits the accompanying Memorandum of Law, the Declaration of Pieter Van Tol and exhibits annexed thereto, and a Proposed Order.

PLEASE TAKE FURTHER NOTICE that any opposing affidavits and answering memoranda of law shall be served so as to be received by the undersigned within seven (7) days after service of this motion and its supporting papers.

PLEASE TAKE FURTHER NOTICE that any reply affidavits and memoranda of law shall be served within two days after service of the answering papers

Dated: April 5, 2024
New York, New York

Respectfully submitted,

/s/ Pieter Van Tol

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